

LAW OFFICES OF  
**JEFFREY LICHTMAN**  
11 EAST 44<sup>TH</sup> STREET  
SUITE 501  
NEW YORK, NEW YORK 10017  
www.jeffreylichtman.com

JEFFREY LICHTMAN  
JEFFREY EINHORN  
DAVID GELFAND

PH: (212) 581-1001  
FX: (212) 581-4999

March 24, 2023

Application granted.

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

SO ORDERED.



Ronnie Abrams, U.S.D.J.  
March 24, 2023

**Re: United States v. Niloufar Bahadorifar, 21 CR 430 (RA)**

Dear Judge Abrams:

I am writing on behalf of defendant Niloufar Bahadorifar to respectfully request a short extension until Tuesday, March 28 in which to file the defendant's sentencing submission so that highly relevant materials from the defendant's family in Iran may be included with our filing. The government, by AUSA Jacob Gutwillig, has no objection to our application as long as the government receives a corresponding extension until April 4 for the filing of their brief.

I apologize for the last minute nature of this application; we had anticipated that these materials would arrive on time.

Thank you for the Court's consideration of this request. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Matthew Hellman, Esq.  
Michael Lockard, Esq.  
Jacob Gutwillig, Esq.  
Assistant United States Attorneys (by ECF)